

JON M. HUNTSMAN, JR. Governor

GARY HERBERT
Lieutenant Governor

Dianne R. Nielson, Ph.D. Executive Director

DIVISION OF AIR QUALITY Richard W. Sprott Director

DAQE-N0919010-06

September 5, 2006

Mr. Philip Senn Kimberly-Clark Worldwide Incorporated 2010 N Rulon White Blvd Ogden, UT 84404

Dear Mr. Senn:

Re: Intent to Approve: Modifications to Approval Order DAQE-AN0919009-04 to Add Equipment

Weber County, CDS SM, ATT Project Code: N0919-010

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Enqiang He. He may be reached at (801) 536-4010.

Sincerely,

C. C. Patel, P.E., Manager Minor New Source Review Section

CCP:EH:dn

cc: Weber-Morgan Health Department Mike Owens, EPA Region VIII

## STATE OF UTAH

## **Department of Environmental Quality**

# **Division of Air Quality**

# INTENT TO APPROVE: Modifications to Approval Order DAQE-AN0919009-04 to Add Equipment

Prepared By: Engiang He, Engineer (801) 536-4010 Email: Ehe@utah.gov

#### INTENT TO APPROVE NUMBER

DAQE-IN0919010-06

Date: September 5, 2006

Kimberly-Clark Worldwide Incorporated Source Contact Kevin B. Thompson (801) 786-2435

> Richard W. Sprott Executive Secretary Utah Air Quality Board

#### Abstract

Kimberly-Clark Worldwide operates a diaper manufacturing plant near Ogden, Weber County, Utah. The plant is located in an attainment area of the county for all criteria pollutants (the city of Ogden is a nonattainment area for  $PM_{10}$  and a maintenance area for CO). The source has proposed to relocate two production lines to this plant from other locations and add three emergency generators. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source. The emissions, in tons per year, will increase as follows:  $PM_{10} + 3.09$ ,  $NO_x + 3.52$ , CO + 5.92, and VOC + 0.05. The increases in emissions will result in the following, in tons per year, potential to emit totals:  $PM_{10} = 30.31$ ,  $NO_x = 11.23$ ,  $SO_2 = 0.04$ , CO = 7.78, and VOC = 7.25.

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Ogden Standard Examiner on September 8, 2006. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-7 The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

#### **General Conditions:**

1. This AO applies to the following company:

#### Site Office

Kimberly-Clark Worldwide, Inc. 2010 North Rulon White Boulevard Ogden, Utah 84404-0715 Phone: (801) 782-2500

Fax: (801) 782-3516

The equipment listed in this AO shall be operated at the following location:

#### **PLANT LOCATION:**

2010 North Rulon White Boulevard Ogden, Utah 84404-0715

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27 4,572,000 meters Northing, 415,000 meters Easting, Zone 12

- 2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
- 3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
- 4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
- 5. All records referenced in this AO, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum periods:
  - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer.
  - B. All other records Two years
- 6. Kimberly-Clark Worldwide shall install and operate the two production lines with control equipment and three emergency generators and shall conduct its operations of the diaper manufacturing plant in accordance with the terms and conditions of this AO, which was written pursuant to Kimberly-Clark's NOI submitted to the Division of Air Quality (DAQ) on June 7, 2006, and additional information submitted to the DAQ on July 13 and August 1, 2006.
- 7. This AO shall replace the AO (DAQE-AN0919009-04)) dated February 11, 2004.
- 8. The approved installations shall consist of the following equipment or equivalent\*:
  - A. Eleven (11) manufacturing lines\* identified as follows:
    - 1) Lines #1 and #2 are controlled by Baghouse #1 (25,000 acfm\*\*).
    - 2) Lines #3 and #4 are controlled by Baghouse #2 (25,000 acfm\*\*).
    - 3) Lines #5 and #6 are controlled by Baghouse #3 (28,000 acfm\*\*).
    - 4) Lines #7 and #8 are controlled by Baghouse #4 (31,000 acfm\*\*).
    - 5) Line #9 is controlled by Baghouse #6.
    - 6) Lines # 10 and #11 are controlled by baghouse #9. Baghouse #10 is identical to Baghouse #11; either Baghouse #10 or #11 can control emissions from Baghouse #9 new equipment
  - B. Baghouse #5 (25,000 acfm\*\*), identical to Baghouse #8, either Baghouse #5 or #8 controls dust from Baghouses #1 through #4 and Baghouse #6 bottoms
  - C. Baghouse #7 controls dust from the cyclones on the reclaiming unit
  - D. Baghouse #8 (25,000 acfm\*\*), identical to Baghouse #5, either Baghouse #8 or #5 controls dust from Baghouses #1 through #4 and Baghouse #6 bottoms

- E. One (1) off-specification diaper reclaiming unit
- F. Misc. natural gas heaters and boilers
- G. One (1) reclaim system vent from the cartridge filter system attached to the drum filter
- H. One (1) central vacuum system vent from the vacuum pulse jet baghouse
- I. One (1) laboratory fume exhaust hood
- J. Three (3) emergency generators new equipment
- \* Equivalency shall be determined by the Executive Secretary.
- \*\* For information only.
- 9. A manometer or magnehelic pressure gauge shall be installed to measure the differential pressure across each of the baghouses. Static pressure differential across the baghouses shall be between 1 to 8 inches of water column. The pressure gauge shall be located such that an inspector /operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 0.2 inches water column. The instrument shall be calibrated in accordance with the manufacturer's instructions. Daily recording of the reading is required.
- 10. The laboratory fume exhaust hood shall be properly maintained and operated as proposed in the NOI dated May 6, 1985.
- 11. Kimberly-Clark Worldwide shall notify the Executive Secretary in writing when the installation of the new equipment listed in Condition #8 has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If the installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the installation. At that time, the Executive Secretary shall require documentation of the continuous installation of the operation and may revoke the AO in accordance with R307-401-18.

#### **Limitations and Tests Procedures**

- 12. Visible emissions from the following emission points shall not exceed the following values:
  - A. Baghouses #1 through #5 20% opacity
  - B. All other baghouses 10% opacity
  - C. Reclaim and Central Vacuum System vents 5% opacity
  - D. All natural gas heaters, boilers and emergency generators 10% opacity
  - E. All other points 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

13. Emissions to the atmosphere from the indicated emission points shall not exceed the following rates and concentrations:

Pollutant: Particulate				
Source	lbs/hr	grains/dscf (68°F, 29.92 in. Hg)		
Baghouse #1	1.63	0.01		
Baghouse #2	1.63	0.01		
Baghouse #3	1.83	0.01		
Baghouse #4	2.39	0.01		
Baghouse #5	1.63	0.01		
Baghouse #6	1.85	0.01		
*Baghouse #7	0.00	0.00		
Baghouse #8	1.63	0.01		

<sup>\*</sup> Not currently in operation.

14. Stack testing to show compliance with the emission limitations stated in the above condition shall be performed as specified below:

A.	Emission Point	<u>Pollutant</u>	Testing Status	<u>Test</u> <u>Frequency</u>
	Baghouse #1	Particulate	**	#
	Baghouse #2	Particulate	**	#
	Baghouse #3	Particulate	**	#
	Baghouse #4	Particulate	**	#
	Baghouse #5	Particulate	**	#
	Baghouse #6	Particulate	**	#
	Baghouse #7	Particulate	**	#*
	Baghouse #8	Particulate	**	#

B. <u>Testing Status and Frequency</u> (To be applied above)

<sup>\*\*</sup> No initial testing is required as a result of issuance of this AO.

<sup>#</sup> Test every five (5) years.

\* Not currently in operation. This requirement shall apply when the baghouse starts operation.

#### C. Notification

The Executive Secretary shall be notified at least 30 days prior to conducting any required emission testing. A source test protocol shall be submitted to DAQ when the testing notification is submitted to the Executive Secretary.

The source test protocol shall be approved by the Executive Secretary prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Executive Secretary.

#### D. <u>Sample Location</u>

The emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, or other methods as approved by the Executive Secretary. An Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approved access shall be provided to the test location

#### E. Volumetric Flow Rate

40 CFR 60, Appendix A, Method 2

#### $F. PM_{10}$

For stacks in which no liquid drops are present, the following methods shall be used: 40 CFR 51, Appendix M, Methods 201 or 201a. The back half condensibles shall also be tested using the method specified by the Executive Secretary. All particulate captured shall be considered  $PM_{10}$ .

For stacks in which liquid drops are present, methods to eliminate the liquid drops should be explored. If no reasonable method to eliminate the drops exists, then the following methods shall be used: 40 CFR 60, Appendix A, Method 5, 5a, 5d, or 5e as appropriate. The back half condensibles shall also be tested using the method specified by the Executive Secretary. The portion of the front half of the catch considered PM<sub>10</sub> shall be based on information in Appendix B of the fifth edition of the EPA document, AP-42, or other data acceptable to the Executive Secretary.

The back half condensibles shall not be used for compliance demonstration but shall be used for inventory purposes.

#### G. <u>Calculations</u>

To determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the

Executive Secretary, to give the results in the specified units of the emission limitation.

#### H. Existing Source Operation

For an existing source/emission point, the production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

#### **Fuels**

15. The owner/operator shall use only natural gas as primary fuel and propane as a backup fuel in the heaters and boilers, and natural gas or propane in the emergency generators.

#### **Records & Miscellaneous**

- 16. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.
- 17. The owner/operator shall comply with R307-150 Series. Inventories, Testing and Monitoring.
- 18. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the DAQ. The Utah Administrative Code R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site: http://www.airquality.utah.gov/

The annual emission estimations below include all emission points of the source. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

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The Potential To Emit (PTE) emissions for Kimberly-Clark Worldwide are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM <sub>10</sub>	30.31
	SO <sub>2</sub>	
C.	NO <sub>x</sub>	11.23
D.	CO	7.78
E.	VOC	7.25

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

C. C. Patel, P. E., Manager Minor New Source Review Section